

FFY 2007 DVR STATE PLAN WRC RECOMMENDATIONS

- 1. State officials should be informed of the impact of the Ticket to Work legislation that artificially increased applications to DVR.**
- 2. With the addition of a centralized intake unit, intake counselors should track data on Ticket holders who may be applying to utilize the CDR protections of the Ticket. The intake counselors should include a benefits analysis for SSI/DI recipients to assist them in making an informed choice about their range of options**

DVR Response:

- The proportionate number of SSA beneficiaries applying to DVR prior to the TTW program and following the program implementation has been relatively stable. However, due to the OOS wait list, there was a slight increase in the percentage of SSA beneficiaries on the DVR caseload in FFY '06. DVR will continue to monitor the percentage of SSA beneficiaries who apply for and receive services and will report notable variances to the WRC.
- There have been several changes to the TTW regulations and processes since the DVR received these recommendations. SSA has removed the TTW timely review progress reporting. The DVR anticipates that revised TTW regulations will be released in the near future. The revised regulations will greatly change the way DVR interacts with both Ticket holders and Employment Networks in regard to the use of the Ticket. DVR plans to be an early implementer DSU for the revised regulations and is working with SSA in this regard.
- DVR will provide benefits analysis to help consumers identify the benefits of going to work.
- DVR will continue and increase activities designed to ensure that consumers are actively engaged in their employment plan; that IPEs have benchmarks and review schedules to assure they are making progress towards the employment goal.

WRC Recommendation:

- 3. Follow through on the plan for a centralized intake unit to complete eligibility and OOS decisions to allow field staff more time to focus on accommodating disability barriers and facilitating employment outcomes.**

DVR Response:

- DVR continues to work towards creating a centralized eligibility/OOS unit. There are infrastructure changes that need to be made before the unit can be created and made operational. Those include creating a centralized scanning (document imaging and storing system) and IT programming changes to the DVR integrated reporting information system (IRIS). The infrastructure changes were researched and approved in SFY '06 and funds set aside in SFY '07 to make the changes.

WRC Recommendation:

4. **Simplify the OOS process by counting each significant limitation. The process of further ranking the significance as severe and non-severe leads to a higher concentration of individuals with the most costly service needs and serious disincentives to employment.**

DVR Response:

- DVR has examined this option and shared the following opinions with the WRC.
 - ◆ Can it be done? “yes”
 - ◆ Should we do it? “needs further impact consideration”
 - ◆ Should we do it now? “no” due to the current effort to reduce the OOS wait list and stabilize the wait time for persons with significant disabilities.

DVR will present an OOS wait list management impact analysis to the WRC by 11/1/06 to determine if this recommendation should be pursued, or not pursued, in FFY '07.

WRC Recommendation:

5. **Meet with RFW and other provider representatives on a regular basis to improve partner relationships and determine how to work together to improve employment outcomes.**
6. **WRC recommends that DVR and vendors have more frequent communication on DVR's expectations of vendors, vendor questions or expectations, and clarification of possible exceptions to fee schedules to meet the needs of individuals.**

DVR Response:

- DVR senior management meets regularly with the vendor partners and vendor association Board Representatives on an invitational basis. DVR has made it a practice to communicate via e-mail on issues of timely import to the statewide provider network.

- DVR management convenes stakeholder workgroups which include providers in areas of systems change (e.g., post-secondary financial aid, long term employment supports, placement fee milestone pilot projects)
- DVR management regularly presents information at statewide conferences sponsored by providers.
- During FFY '07, DVR will offer training on service fee schedules and technical specifications to vendor partners.

WRC Recommendations:

7. **Do not implement a change in policy prior to an analysis of the impact and training for all field staff.**
8. **We value the level of information and discussion the Council benefits from when reviewing policy and intent of policy. We believe all field staff should receive the same level of information to assist them in implementing policy and communicating the intent to consumers**
9. **WRC recommends that DVR commit the staff time and resources needed to increase training for staff on critical areas, such as knowledge of the Rehabilitation Act and regulations, how the Act guides decision making in individual cases and policy interpretation.**
10. **WRC recommends that DVR continue to make improvements in communication with the field staff. Council interviews of counselors have shown that while counselors receive information on policy changes, they often do not know why the changes have been made and may apply the changes more broadly than management intended.**

DVR Response :

- When policy changes or modifications are made, DVR management explains in written instructions the previous policy, the reasons for the change, the new policy and the procedures, if any, that accompany the new policy.
- In addition to written instructions, DVR management transmits the information and provides training to field staff in various ways including:
 - ◆ WDA Directors and Supervisors (train the trainer approach)
 - ◆ DVR on-line Knowledgebase resource (new in SFY '06)
 - ◆ RSA regulatory and sub-regulatory resources
 - ◆ DVR topical guidance papers and FAQ
 - ◆ Interactive discussion opportunity with policy analyst
 - ◆ Resource for related web-based information and tools

- ◆ Face-to-face policy implementation meetings are held with DVR Statewide Management at least 2 times per year in each of the eleven workforce development areas to provide management updates, direction and an opportunity for discussion with all field staff.
- ◆ In SFY '07 DVR will provide 3 regional trainings in which all staff will have the opportunity to participate. The focus of the trainings will be to improve statewide communication and alignment of policy and practice and to strengthen the capacity of the DVR service delivery teams.
- ◆ Regularly scheduled, comprehensive staff training opportunities are provided which focus on the Rehabilitation Act as it relates to the DVR mission, policy and practice.

WRC recommendation:

11. **The Council and DVR should study the employment outcomes of college graduates by campus and program to provide information to assist consumers in making an informed choice.**
12. **DVR Counselors and DWS Navigators should be trained in how to provide labor market information to consumers as they choose an employment goal so the goal is based on interest, ability, and labor market availability.**

DVR Response:

- Because of limitations in its data collection system, DVR is not able to analyze and study the factors in recommendation 11. Not all Wisconsin colleges/universities conduct employment outcome studies of their graduates or do so only sporadically.
- A reliable resource for making an informed choice regarding an anticipated career and employment outcome and the training needed to achieve it, is the regularly updated Labor Market Information (LMI) that is made available on a state and county level. DWD provides this information regularly to DVR managers and staff. DWD also annually trains staff in the use of LMI.

WRC Recommendation:

13. **DVR's review of IPEs should determine if disability related barriers and accommodation needs are addressed since this is the core difference between DVR and One Stop service.**

DVR Response:

- This recommendation is being addressed as part of the DVR corrective plan in response to the RSA 107 review.
- DVR policy will be updated to address more clearly services related to barriers and accommodation need, especially AT services.
- The new Quality Assurance unit at DVR Central Office will review and monitor cases to make sure we are addressing these issues.

WRC Recommendation:

14. The WRC recommends the following action be taken to address outreach concerns related to subminimum wage workers:

- Work with the Bureau of Labor Standards to obtain the names of facilities with individuals earning less than \$1.00 to determine if these individuals have been referred to DVR in the past 3 years.
- Starting with the group receiving less than \$0.10 per hour, DVR will contact the agency where the individual is currently working and ask the Director to ask the individual/guardian if the person is interested in exploring Supported Employment.
- If the individual agrees, the local DVR office will follow-up with the application process.
- DVR will provide the Bureau of Labor Standards and WRC with a breakdown of the number of individuals who want to consider Supported Employment, who do not want to consider Supported Employment, and those who were undecided.

DVR Response:

- During FFY '07, DVR WDA managers will contact the community rehabilitation agency where individuals with the most significant disabilities are currently working and invite individuals and/or guardians to an orientation program to learn about DVR's role and opportunities for competitive or supported employment opportunities. A DVR outreach orientation may occur at the facility or another location.
- If the individual agrees, the local DVR office will follow up with the application process.
- DVR has shared this recommendation with the DWD Secretary's Office (SO) and the Division of Equal Rights (ERD), the Division that has the legal authority to address sub-minimum wage issues. The DWD has

appointed an advisory workgroup to study the issue of sub-minimum wage practices. The WRC chair has been appointed as a member of the workgroup at the recommendation of DVR.

WRC recommendation:

- 15. The WRC recommends that the post-secondary grant be set at (up to) \$3,000 with accommodations to the funding policy when appropriate.**

DVR Response:

- DVR accepted the WRC recommendation and established the SFY '06 post-secondary training grant level at "up to \$3,000" with an exception process that accommodates a change to the funding level when appropriate.
- The DVR in consultation with the WRC established the SFY '07 post-secondary training grant level at "up to \$4,000" with an exception process that accommodates a change to the funding level when appropriate.

WRC Recommendation:

- 16. WRC recommends that DVR continue to make improvements in the OOS waiting list system to allow timely activation of individuals on the waiting list as individuals "graduate" from the DVR program. WRC wants to acknowledge the changes that were made to operate a "seamless" waiting list that allows DVR to inform individuals of the consumer's position on the waiting list.**

DVR Response:

- DVR has improved the OOS waiting system to allow timely activation during SFY '06 by:
 - ◆ Activating individuals from the wait list on a monthly basis
 - ◆ Reestablishing immediate activation for individuals with the most significant disabilities as of October 2005.
 - ◆ Establishing an activation plan for SFY '07 that would maintain immediate activation for individuals with the most significant disabilities and reduce the wait time for persons with significant disabilities to three months or less.

WRC recommendation:

- 17. WRC recommends that DVR obtain the results of the Job Center accessibility survey and play a leadership role in encouraging the Job Centers to implement the recommendations.**

DVR Response:

- Recommendations from surveys were completed and distributed by DWD/DWS to each Workforce Development Area Board in SFY '06.
- The DWD/DWS also made federal Workforce Improvement Grant funds available to the WDA Boards to make accessibility improvements in the Job Centers as identified in the reports.
- As a management and mandatory partner in each WDA, DVR plays a leadership role in assuring that Job Center facilities and services are accessible to persons with disabilities.